## THE LAW OFFICES OF ROBERT M. BOVARNICK

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January 14, 2005

## **VIA ELECTRONIC FILING**

Michael E. Kunz, Clerk US District Court for the Eastern District Of Pennsylvania 601 Market Street Philadelphia, PA 19103

Re: Bishnu C. Borah, et al. v. Monumental Life Insurance Company, et al. Case No. 04-3617

Dear Mr. Kunz:

This firm represents Defendants Sea Nine Associates, Steven Ross, Kenneth Elliot, Kae Consultants and Sylvia Calhoun Ross in the above referenced matter.

With respect to Defendant Sea Nine Associates, enclosed for filing are the following:

- 1. Notice of Motion to Dismiss Plaintiffs' Complaint;
- 2. Memorandum of Law in Support of Motion to Dismiss;
- 3. Proposed Order; and
- 4. Certification of Service.

With respect to Defendants Steven Ross, Kenneth Elliot, Kae Consultants and Sylvia Calhoun Ross enclosed for filing are the following:

- 1. Notice of Motion to Quash, Strike or Dismiss the Complaint;
- 2. Memorandum of Law in Support of Motion to Quash, Strike or Dismiss the Complaint;
- 3. Proposed Order; and
- 4. Certification of Service.

Michael Kunz January 14, 2005 Page 2

I would appreciate it if you would send a confirmation to me of this ECF filing. Thank you for your assistance in this matter.

Sincerely,

Robert M. Bovarnick

RMB/leb

Cc: Steven Fram, Esq. (w/encl.) Christopher Leise, Esq. (w/encl.) Charles L. Becker, Esq. (w/encl.)